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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

MACON COUNTY INVESTMENTS, INC.;)
REACH ONE, TEACH ONE OF)
AMERICA, INC.,)
)
PLAINTIFFS,)
)
v.) CIVIL ACTION NO.: 3:06-cv-224-WKW
)
SHERIFF DAVID WARREN, in his)
official capacity as the SHERIFF OF)
MACON COUNTY, ALABAMA,)
)
DEFENDANT.)

MACON COUNTY GREYHOUND PARK, INC.'S OBJECTIONS TO SUBPOENA

Macon County Greyhound Park, Inc. ("MCGP" or "Respondent") through counsel objects to the subpoena issued by the Plaintiffs in the above-styled cause and, as grounds therefore, states as follows:

1. The Respondent is not a party to the above-styled action.

2. The subpoena is invalid because of insufficiency of service of process and/or insufficiency of process.

3. The document request included in the subpoena is vague, unclear and ambiguous and contains terms that are not defined. Moreover, the subpoena fails to identify the documents sought with particularity or detail.

4. The subpoena is overly broad, unduly burdensome and oppressive. Further, the subpoena seeks confidential, commercial, proprietary and competitive information beyond the scope of this litigation. The subpoena is so broad in scope and time that it amounts to harassment and is not supported by good cause.

5. Many of the documents and records sought by the subpoena are not relevant to any claim or defense asserted in the pending litigation between the parties nor is their production likely to lead to the discovery of admissible evidence.

6. The subpoena seeks information protected by the attorney-client privilege and the work product privilege.

7. The subpoena seeks information that is a matter of public record or is more readily available from the parties in the pending action.

8. The Respondent further objects to giving a deposition on the subject matter of the documents requested by Plaintiffs' subpoena for the reasons stated herein.

Respectfully submitted,

John M. Bolton, III
One of the Attorneys for Respondent,
Macon County Greyhound Park, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following by placing a copy of the same in the United States Mail, with proper postage prepaid, on this the 9 day of March 2007:

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